

1 **ALVERSON, TAYLOR,**
2 **MORTENSEN & SANDERS**
3 KURT R. BONDS, ESQ.
4 Nevada Bar #6228
5 MATTHEW M. PRUITT, ESQ.
6 Nevada Bar #12474
7 7401 W. Charleston Boulevard
8 Las Vegas, NV 89117
9 (702) 384-7000
10 efile@alversontaylor.com

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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA
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12 EDWARD STOLZ, an individual,)
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12 CASE NO.: 2:14-cv-02060-RFB-NJK

13 **STIPULATION AND ORDER TO**
14 **EXTEND TIME FOR PARTIES TO**
15 **FILE REPLIES TO MOTIONS FOR**
16 **SUMMARY JUDGMENT**

17 **[THIRD REQUEST]**

20 **COME NOW**, Plaintiff, EDWARD STOLZ, by and through his counsel of record, the law
21 firm ALVERSON, TAYLOR, MORTENSEN & SANDERS, and Defendant, SAFECO
22 INSURANCE COMPANY OF AMERICA, by and through its counsel of record, the law firm of
23 KOELLER, NEBEKER, CARLSON & HALUCK, LLP, and hereby stipulate to extend the time for
24 each to file their Replies to one another's respective Motions for Summary Judgment filed in the
25 above-entitled matter.

27 Each party filed their own Motion for Summary Judgment on January 8, 2016. Oppositions to
28 the respective Motions were filed by the parties on February 16, 2016. (See, Court Documents Nos.

ALVERSON, TAYLOR, MORTENSEN & SANDERS
LAWYERS
7401 WEST CHARLESTON BOULEVARD
LAS VEGAS, NEVADA 89117-1401
(702) 384-7000

1 42, 43, 46 and 47, on-file herein). On March 1, 2016, this Court granted the parties' Stipulation to
 2 extend Replies to the respective Motions to allow for potential informal settlement negotiations and
 3 mediation and/or a settlement conference. (*See*, Court Document No. 49, on-file, herein).

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 5 The Court again granted the parties' Second Stipulation to extend Replies of the respective
 6 Motions on April 26, 2016 due to unexpected scheduling concerns which made scheduling mediation
 7 more difficult than anticipated. The parties attempted to reschedule mediation as soon as possible in
 8 order to meet the new Reply Deadlines of Friday, July 1, 2016; however, they have been unable to
 9 find a date which has worked for both parties. Plaintiff is not currently a resident of Nevada and has
 10 been required in his business to travel over the summer to places outside Nevada. Notwithstanding,
 11 the parties have found and scheduled a date for mediation for August 19, 2016.

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 13 The parties hereby request an Order from this Court memorializing that Replies to each
 14 party's Motion for Summary Judgment are now due by or before September 19, 2016, with the joint
 15 status report, currently due by July 8, 2016, to be due on or before September 26, 2016.

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 17 ALVERSON, TAYLOR,
 18 MORTENSEN & SANDERS

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 20 KOELLER, NEBEKER, CARLSON
 21 & HALLUCK, LLP

22
 23 // S// Matthew M. Pruitt
 24 KURT R. BONDS, ESQ.
 Nevada Bar #6228
 MATTHEW M. PRUITT, ESQ.
 Nevada Bar #12474
 7401 W. Charleston Boulevard
 Las Vegas, NV 89117
 Attorneys for Plaintiff,
 EDWARD STOLZ

25
 26 // S// David M. Gould
 27 DAVID M. GOULD, ESQ.
 Nevada Bar #11143
 300 South Fourth Street, Suite 500
 Las Vegas, NV 89101
 Attorneys for Defendant,
 SAFECO INSURANCE COMPANY OF
 AMERICA

1 **ORDER**

2 **IT IS HEREBY ORDERED** that the time for each party to file its Reply in support of
3 the presently pending Motions for Summary Judgment (Court Documents Nos. 42, 43, 46 and
4 47, on-file herein) is extended until **September 19, 2016**. The parties will also submit a joint
5 status report to this Court regarding any pending motions by **September 26, 2016**.

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RICHARD F. BOULWARE, II
United States District Judge

DATED: July 1, 2016.

Respectfully submitted by:

ALVERSON, TAYLOR,
MORTENSEN & SANDERS

// S// Matthew M. Pruitt
KURT R. BONDS, ESQ.
Nevada Bar #6228
MATTHEW M. PRUITT, ESQ.
Nevada Bar #12474
7401 W. Charleston Boulevard
Las Vegas, NV 89117
Attorneys for Plaintiff,
EDWARD STOLZ

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